



ACLU of New York



January 11, 2023

BY ECF

The Honorable Gabriel W. Gorenstein
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

*Re: In re: New York City Policing During Summer 2020 Demonstrations, No. 20-CV-8924
This Filing is Related to All Cases*

Dear Judge Gorenstein:

We write on behalf of the non-stayed Plaintiffs pursuant to your order dated January 9, 2023 (Dkt. No. 807), concerning Plaintiffs' letters in Dkt. Nos. 774 and 806 and appreciate the opportunity to provide additional clarification. Plaintiffs confirm that we wish to have the dispute regarding Defendants' privilege assertions resolved based on the letters submitted and do not seek formal briefing. In accordance with your order, we selected a sample of documents to be sent to the Court for potential in camera review and transmitted that list to Defendants today.¹

Respectfully submitted,

By: /s/ Daniel Lambright
Daniel R. Lambright
Molly K. Biklen
Jessica Perry
Robert H. Hodgson
Veronica Salama
Lisa Laplace
Christopher T. Dunn
New York Civil Liberties Union Foundation
125 Broad Street, 19th Floor
New York, NY 10004
(212) 607-3300
dlambright@nyclu.org

By: /s/ Corey Stoughton
Corey Stoughton
Jennvine Wong
Rigodis Appling
The Legal Aid Society
199 Water Street
New York, NY 10038
(212) 577-3367
cstoughton@legal-aid.org

¹ This sample does not include examples of the “DHS Reports,” given that Defendants’ cite only the need for federal authorization to produce these documents, in an apparent withdrawal of any independent privilege assertions over them, as discussed in our Letter in Dkt. No. 806.